

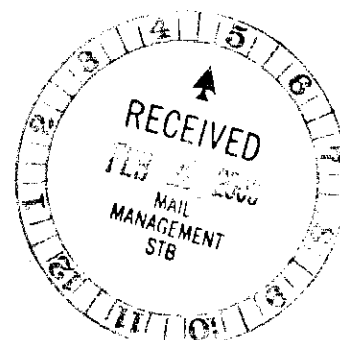
197411

B·M bell &
mackenzie co. ltd.500 Sherman Ave. North
P.O. Box 844 LCD #1
Hamilton, Ontario L8N 3N9
Telephone (805) 527-8000
Fax (805) 527-8660

February 23rd., 2000

Mr. Vernon A. Williams, Secretary
Surface Transportation Board
Office of the Secretary, Case Control Unit
Attn: STB Ex Parte No. 582
1925 K Street, N.W.
Washington, D.C. 20423-0001
U.S.A.RECEIVED
Office of the Secretary

FEB 29 2000



Dear Sir:

My name is Richard Bell, and I am the President of Bell & MacKenzie Co. Ltd. located in Hamilton, Ontario, Canada. Bell & MacKenzie is an industrial mineral distributor and Hamilton, Ontario is located at the far western end of Lake Ontario. We import, stock and distribute industrial minerals, primarily silica sands and granulated slags, for the sandblast, foundry, and construction products industry in Ontario and Eastern Canada.

We have been in business over 27 years and have been extensive users of rail service for this time period, utilizing both the CN and the BN rail systems.

The purpose of this letter is to comment on the issues to be discussed on March 8th, 2000 in Ex Parte 582.

We strongly encourage the Surface Transportation Board (STB) to focus on whether the proposed CN-BNSF combination is good for shippers, not on potential downstream effects. The CN-BNSF combination should be judged on its merits alone and if other carriers propose mergers, then these cases ought to be evaluated on their merits. In evaluating the merits of the aforementioned combination the STB need not dwell on the hypothetical responses of other carriers. The STB can and should deal with those possibilities if and when they become real, if and when those carriers bring their proposals to the STB.

The timing of the proposed CN-BNSF is not the central issue for our company. Our concern is service. Recent mergers have failed on service (sometimes miserably!) not because of timing. Accordingly, the STB should focus on ensuring that the CN-BNSF combination, and any other future mergers, will deliver service.

The STB has a comprehensive and thorough process to evaluate railroad transactions and to protect the public interest. It should fairly evaluate the CN-BNSF combination according to that process. Do not let other railroads use the Surface Transportation Board process to protect themselves and not shippers

Yours Very Truly,
Bell & MacKenzie Co. Ltd.

Richard A. Bell, President

- Sandblast Sands
- Filtration Sands
- Foundry Sands

- Empire Blast Equipment
- Bullard Safety Equipment
- Goodyear Blast & Air Hose

- Steel Shot & Grit
- Silica Free Sands
- Corn Cob Grit